



GMP and Declaration of conformity with the European and US legislation for materials and articles made of paper and nature straw intended to come into contact with foodstuffs.

Bio Strohhalme GmbH, 83064 Raubling, Heubergweg 3, Germany

We hereby declare that both our straight and flexible as well as customer specific designed paper drinking straws and the "Nature Straws" are free of lead, chlorine and softeners and comply with the European and US guidelines for paper products that are coming into contact with food as specified below:

FDA / EU /Toxicity:

- Food and Drug Administration - The finished products listed above have been tested and approved to be in compliance with FDA test method 21 CFR 176.170.
- Council of Europe - Testing was also conducted to obtain evidence of compliance with Council of Europe Resolution AP (2002)1 relating to paper materials and articles intended to come into contact with foodstuff. Hence, the submitted samples comply with The General Requirement (Article 3) in EU Regulation No. 1935/2004 as referenced in Report Number EFSH13080415-STas well as with the boundaries specified in §§ 30,31 LFGB (Lebensmittel- und Futtermittelgesetzbuch)
- Toxicity Safe - Inks used for printing on the surface of our drinking straws have been tested, certified and are guaranteed acceptable for direct contact with food products, in accordance with the applicable chapters and sections of Title 21 of the Code of Federal Regulations (21 CFR). In addition, a safety assessment has been conducted, and based on the toxicity testing results; the conclusion provides added evidence that all chemical components used are proven to be safe as tested by the Health, Environmental, & Regulatory Services of Intertek USA, Inc. The Toxicology Risk Assessment report has been made available for reference.

FSC/SFI:

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- The vast majority of material used in the composition of these products is in compliance to both Sustainable Forestry Initiative (SFI) and Forest Stewardship Council (FSC). This paper-based material comes from a sustainably managed forest with chain-of-custody procedures in place.

When coated paper is involved, periodic audits are conducted from the material provider to review their environmental performance. It's common for this coated paper to be used in the food service industry.

Product Compostability:

- Sample product was submitted to an independent source for substrate analysis. The evaluation was successful resulting in evidence that the product tested passed the substrate analysis, meeting compostability requirements. As a result, a letter of Compostability Acceptance has been granted to our production.

ISO 2001:2008 Certificate of Registration:

- Our production has been assessed and certified as meeting the requirements of ISO 9001:2008. The paper drinking straw products referenced above are included in the scope of this registration.

After usage our paper drinking straws and "Nature Straws" are biodegradeable and 100% compostable.

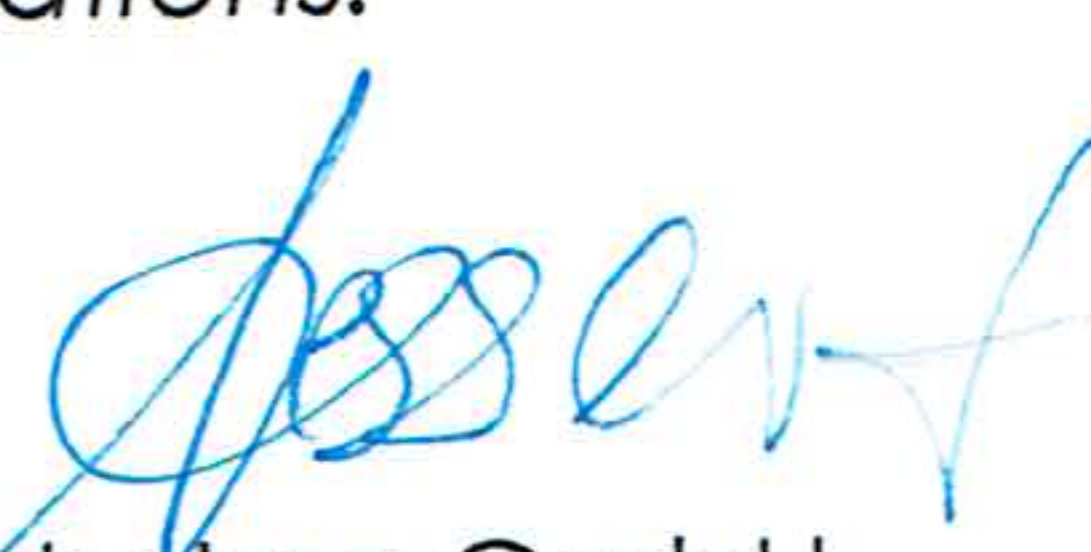
Intended Usage and Restrictions

The paper drinking straws and our "Nature straws" are suitable for all kinds of beverages. However, there are restrictions for hot beverages (above 35 degrees) as they will soften quicker.

Conditions for Usage and storage

The paper drinking straws are to be stored in dry environments.

Good manufacturing practice (GMP) is that part of quality assurance which ensures that our paper drinking straws are consistently produced and controlled to the quality standards appropriate to their intended use and as required by the marketing authorizations.


Bio Strohhalme GmbH
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